

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

ACT II JEWELRY, LLC
d/b/a lia Sophia,

Plaintiff,

vs.

MU YING ZHU d/b/a
2008JEWELRYQUEEN,
JAMES R. MULLINS, and
JOHN DOES 1-10,

Defendants.

Civil Action No. 2:09cv407

**CONSENT MOTION FOR
EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS**

COME NOW Defendants Mu Ying Zhu (“Zhu”) and James R. Mullins (“Mullins”) (collectively referred to as “Defendants”), by counsel, and with the consent of the Plaintiff, respectfully move for an Order extending the time to file responsive pleadings until October 5, 2009. As grounds for this Motion, Defendants state as follows:

1. Plaintiff has consented to Defendants’ request for an extension of time, until October 5, 2009, to file their responsive pleadings;
2. This request is being made as the parties are engaged in negotiations towards a good faith settlement of this matter;
3. Defendants represent that this Motion is not filed for any improper purpose or motive and that just cause exists for this request for this time extension;
4. All parties represent that this Motion does not have any prejudicial effect on any party and that this Consent Motion will not cause any undue delay to the resolution of this matter.

Respectfully Submitted,

Dated: September 3, 2009

/s/

Michael G. Bowen
Virginia State Bar No. 26039
Counsel for Defendants Mu Ying Zhu and
James R. Mullins
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5104 W. Village Green Drive, Suite 108
Midlothian, VA 23112
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Fax 804-744-9119
mbowen@bbepc.com

SEEN AND CONSENTED TO:

Dated: September 4, 2009

/s/

Barry Dorans
Virginia State Bar No. 23472
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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of September, 2009, I will file via United States mail, postage prepaid, a true copy of the foregoing Consent Motion to all counsel of record as follows:

Michael G. Bowen, Esq.
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*Counsel for Defendants Mu Ying Zhu d/b/a 2008JewelryQueen and
James R. Mullins*

/s/

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